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January 22, 2010

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Attn: Wireless Telecommunications Bureau

RE: Reply Comments WT Docket 09-217

Dear Ms. Dortch;

The County of Orange, California currently operates a private (local government) 900MHz multi-site POCSAG one-way paging system for alerting and dispatch of 2,100 users, including first responders, support personnel and administrators, and other personnel related to public safety and government functions. This paging system is an adjunct to a larger integrated voice radio communications system consisting of an 800 MHz simulcast digital and analog, multi-site, trunked radio system supporting over 20,000 subscribers. Together, these systems help us to effectively coordinate routine and emergency government services for 3.1 million citizens within Orange County, over approximately 800 square miles.

We have found radio paging to be particularly useful for alerting, dispatch, and informational update bulletins. Compared to the portable radio units, pagers are smaller, more discrete, less costly, have longer battery life, but most importantly, provide the county with a standalone, redundant, wide-area communications tool to help assure timely and accurate messaging to our users.

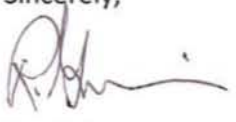
We possess a solid technical and operational working knowledge of the benefits and features of two-way paging systems, and understand that our one-way paging system could be upgraded to support two-way pagers. We understand that the NPCS band includes several return-only channels intended to be paired with forward paging channels for the purposes of upgrading a one-way paging to support two-way pagers. We understand these channels could be used to upgrade our system, and we see potential value in doing this. We understand though, that return-only NPCS channels, like all NPCS channels in our area, were auctioned years ago and are not available to us through normal channel acquisition procedures. Therefore, we had not pursued an upgrade.

We can also appreciate why organizations in NPCS Region 2 may have been slow to upgrade their one-way paging systems to two-way paging systems, even though they ostensibly have spectrum available to them for this purpose. First, traditional telecommunications systems may be extended to a 10-20 year useful life, so only a handful of agencies would even have come to the point of replacing or upgrading a system (particularly in this economic climate). And second, vendors are more likely to feature other types of systems that can be licensed without the challenges and delays involved in obtaining a NPCS license.

We ask that the FCC not take this lack of action in NPCS Region 2 as any indication that the NPSTC request lacks merit. Two-way paging is of obvious interest to any organization currently operating a one-way system, including Orange County. To move forward with this type of system, some number of vacant NPCS channels would need to be assigned to a newly created public safety pool, and rules would need to be codified as to how authorization should be obtained to use them. Once such a framework exists, agencies and vendors will be able to deploy two-way paging systems according to local requirements, where they make sense.

We urge the FCC to engage in working with the NPSTC to establish these rules.

Sincerely,



Ray Grimes
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